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Hearing Conservation Policy

PURPOSE

Hurt & Proffitt, Inc., hereafter referred to as "The Company", has established a Hearing Conservation Program to protect worker(s) from the hazards of noise on the job. The Company requires that each employer implement a hearing conservation program when workers are exposed to noise levels exceeding 85 dB. It is not hard to exceed this level of noise on many of the job's sites. Typically, noise levels exceeding 85 dB are experienced when working with any type of pneumatic chipper or hammer, metal saw, grinders, and heavy machinery. See attachment I for list of some common noise levels.

SCOPE

The OSHA Standard on Occupational Noise Exposure, 29 CFR 1910.95, established the permissible limit of noise as 85 dB(A) (decibels), expressed as an eight-hour (8-hours), time-weighted average, (TWA). This standard allows short-term unprotected noise exposure up to a maximum of 115dB (A), peak sound.

The noise standard requires the identification by personnel monitoring of workers who may be exposed above the 85 dB (A), 8-hour, TWA. Hearing protection is also required for specific activities or using certain types of equipment.

RESPONSIBILITIES

The Safety Coordinator or delegate is responsible for developing a written Hearing Conservation Procedure and overseeing the training of all workers in the company. The Safety Coordinator or delegate is responsible for the monitoring and administering this procedure.

PROCEDURES

The Company has taken a conservative approach to noise hazards by establishing this program. The following elements establish the program:

- An Audiometric Testing Program
- A Worker Education and Training Program
- Monitoring and Analysis of Workplace Noise Levels
- Providing Suitable Engineering Controls

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- Providing Hearing Protectors
- Maintain required Records

Audiometric Testing Program

Each new worker whose work exposes them to "excess noise levels" will receive an audiometric test as part of a pre-screening physical examination or within 6 months of a workers first exposure at or above the 8-hour Time Weighted Average (TWA) to establish a baseline audiogram against which subsequent audiograms can be compared.

Annually, all workers who are exposed to noise levels exceeding the 85 dB standard will be given a follow-up audiometric examination to monitor for any significant changes in their hearing ability. Workers will be formally notified if there is any change in their hearing as the result of the testing. The Standard has defined this shift as a change in hearing threshold relative to the baseline audiogram of an average of 10 dB or more at 200, 3000 and 4000 hz in either ear. In determining whether a standard threshold shift has occurred, allowance may be made for the contribution of aging (presbycusis) to the change in hearing level by correcting the annual audiogram according to the procedure described in Appendix F: "Calculation and Application of Age Correction to Audiograms." When audiometric testing is required, each affected worker must not be exposed to any workplace noise for at least 14 hours prior to their test. This requirement may be met by wearing hearing protectors which will reduce the worker's exposure to a sound level of 80 dB (A) or below.

Audiometric tests shall be performed by a licensed or certified audiologist, otolaryngologist, or other physician, or by a technician who is certified by the Council of Accreditation in Occupational Hearing Conservation, or who has satisfactorily demonstrated competence in administering audiometric examinations, obtaining valid audiograms, and properly using, maintaining, and checking calibration and proper functioning of the audiometers being used. A technician who operates microprocessor audiometer does not need to be certified. A technician who performs audiometric tests must be responsible to an audiologist, otolaryngologist, or physician.

An audiologist, otolaryngologist or physician will review problem audiograms and shall determine whether there is a need for further evaluation. The company will provide to the person performing this evaluation the following information:

- A copy of the 29 CFR 1910.95 Hearing Conservation
- The baseline audiogram and most recent audiogram of the worker to be evaluated
- Measurement of background sound pressure in the audiometric test room as required in 29 CFR 1910.95 Appendix D
- Records of audiometric calibrations as required by 20 CFR 1910.95 Appendix

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If a comparison of the annual audiogram to the baseline audiogram indicates a standard threshold shift as defined by OSHA, the worker will be informed of this fact, in writing, by The Company within 21 days of determination.

Unless a physician determines that the standard threshold shift is not work related or aggravated by occupational noise exposure, the company will ensure that the following steps are tank when a standard threshold shift occurs:

- A worker not using hearing protectors will be fitted with hearing protectors, trained in their use and care, and required to use them
- A worker already using hearing protectors shall be refitted and retrained in the use of hearing protectors and provided with hearing protectors offering greater attenuation if necessary
- Refer the worker for a clinical audiological evaluation or an otological examination, as appropriate, if additional testing is necessary or if the company suspects that a medical pathology of the ear is caused or aggravated by the wearing of haring protectors
- Inform the worker of the need for an otological examination if a medical pathology of the ear which is unrelated to the use of hearing protector is suspected

If subsequent audiometric testing of a worker whose exposure to noise is less than an 8-hour TWA average of 90 decibels indicates that a standard threshold shift is not persistent The Company:

- Will inform the worker of the new audiometric interpretations
- May stop the required use of hearing protectors for that worker

Worker Education and Training

The Company workers must be trained in the use of personal hearing protection equipment and have access to information and training materials. Each worker must know how to clean and maintain the hearing protection equipment. The training will cover the following:

- Training will be for all workers who are exposed to noise at or above the 8-hour TWA of 85 dB
- The training will be repeated annually for each worker included in the hearing conservation program
- The effects of noise on hearing
- The purpose of hearing protectors, the advantages, disadvantages, and the attenuation of various types and instruction on selection, fitting, use and care
- The purpose of audiometric testing, and an explanation of the test procedures
- Access to information and training materials

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Monitoring and Analysis of Workplace Noise Levels

The Company will periodically or as necessary, conduct noise level surveys of the workplace. The results of these surveys will be made available to workers.

Any job area or company location found to be in excess of the allowable designated noise levels that cannot be brought into compliance with the noise standard will be designated as an area where hearing protectors are to be worn. When signs are posted workers must wear hearing protection. The signs may read as follows:

NOTICE EAR PROTECTION REQUIRED IN THIS AREA

REMEMBER: A client may determine if a unit or work area is classified as a high noise area. After the decision is made, company workers will be instructed to wear the appropriate hearing protection.

Provide Suitable Engineering Controls

Where appropriate, The Company will provide engineering controls to reduce noise exposure. Due to the complexity of most job sites, it is difficult, if possible, to institute effective engineering controls for most noise exposures. Should this be the case, then workers will be required to wear suitable hearing protection.

Provide Hearing Protectors Where Required

The Company will provide the required workers with hearing protectors if their 8-hour TWA is above the 85dB (A). The company will also make hearing protectors available to all workers exposed to a TWA above 85dB (A) at no cost to the worker. Any worker who may have a significant threshold shift of hearing level will be required to wear hearing protection if they are exposed to noise TWA of 85dB. The Company will ensure all Hearing protectors meet the requirements in CSA Standard Z94.2-02, Hearing Protection Devices – Performance, Selection, Care and Use. The Company will make a concerted effort to find the right protector for each worker, one that offers the right attenuation, is accepted in terms of comfort, and is used by the worker.

Responsibilities

THE CLIENT WILL:

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- Determine all sources of noise at or above 85dD
- Determine if personnel have 8-hour TWA exposures at or above fifty percent (50%) of the OSHA allowable
- Review noise exposures annually for all job classifications with TWA
- Exposure at or above fifty percent (50%)
- Ensure that audiograms are made annually for personnel whose TWA exposures are at or above fifty percent (50%) of the OSHA allowable

JOB SITE SUPERVISION WILL:

- Require hearing protection in all areas with noise levels at or above the 85dB(A) and for all task which generate such noise level (i.e., grinding, hammering). Ear plug shall be required in an area and/or on tasks with the sound levels exceeding 105dB
- Alert workers to possible hazardous noise exposures, Signs shall be posted in work areas in which the sound levels may exceed 85dB. These signs will be posted by the client
- Evaluate the need for engineering and/or administrative controls to reduce the noise levels below the 85 dB and, where feasible, develop a plan to reduce all personnel exposures to less than fifty- percent (50%) of the OSHA allowable
- Make hearing protection available and enforce its use by all workers with TWA
 exposures at or above the fifty percent (50%) of the OSHA allowable and/or by
 those who must enter or work in areas where the noise level is 85dB or above

REMEMBER - The client determines if a unit or work area is classified as a high noise area. After the determination is made, the company's workers will be instructed to wear the appropriate hearing protection.

Recordkeeping

All record-keeping for this program will be maintained in the office. Records will include:

- Audiometric tests
- Noise surveys
- Worker training
- Engineering controls implemented
- Record of purchase of hearing protector

Work required Hearing Protectors

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There are many jobs or types of work that generally produces noise level that intermittently or for short durations exceed the permissible TWA. It is the policy of The Company to require all workers who are engaged in these jobs to wear hearing protectors.

Hearing Protectors

Workers may choose the type of hearing protection that best suits their assignment and personal preference among those listed below. Each worker required to wear hearing protection is responsible for carrying hearing protection on their person. Hearing protection is furnished at no cost to workers.

EAR PLUGS – Most ear plugs, when worn properly, have a noise reduction rating (NRR) on the package. Most ear plugs have NRR of about 30.

EARMUFFS – Adjustable muffs can be worn in three positions:

1.	Over the head	24 this depends on the NRR of the Earmuff)	1

2. Under the chin3. Behind the head20

Computing the Hearing Protection Level

To compute the actual hearing protection level under the protector, subtract 7 dB(A) from the Noise Reduction Rating (NRR), then divide the number by 2, and subtract the remainder form the measured noise level dB (A).

For example:

- NRR of 29 -7 = 22 dB(A) 22 dB(A) \div 2 = 11 dB(A)
- Noise level of 95 dB(A) 11 = 84 dB(A)
- Therefore, this device offers a protection level of 11 dB(A)

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ATTACHMENT I

The following list represents some work activities and equipment which will require the use of hearing protection:

ACTIVITIES AND/OR EQUIPMENT TYPICALLY RESULTING IN HIGH NOISE LEVEL	ESTIMATED AVERAGE NOISE LEVEL dB(A)
1. Air Arc Gouging	115
2. Air compressor	95
3. Chain saw	107
4. Electric Disc Grinder	100
5. Forklift inside a trailer	98
6. Heavy equipment working	100
7. Impact tools	108
8. Pneumatic chipping hammer	110
9. Abrasive blasting	100
10. Welding machines	95



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ATTACHMENT II

HEARING CONSERVATION PROGRAM FOLLOW UP TRAINING RECORD

FROM:				
Manager or Supervisor				
The worker listed below recently was found to have a confirmed significant shift in the hearing threshold (as defined by OSHA). An investigation and additional training are required. When this form is completed and reviewed with the worker, please file it in the office.				
WORKER NAME:				
Print or type First Name, MI, Last Name				
Social Security Number or Worker Number	Reported Date			
JOB CATEGORY				
JOB CATEGORY (Current Assignment)				
The Potential for noise exposure and specific requirements for us area should be reviewed with this worker within 2 weeks. If he have not been established in this work area, it must be done as so The retraining for this worker should include:	aring protection requirements			
 The temporary and permanent effects of noise on hearing Established hearing protection requirements 				
 Any questions the worker may have on the use of hearing The proper use of hearing protection 	protection			
Comments the worker has on potential off-the-job noise e	exposure			
Comments on discussion held:	<u> </u>			
I have discussed the above items with this worker:				
				

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Manager or Supervisors Name (print) Signature Date of Discussion